



Fw: *Confidential: Fw: Former City Scrap & Salvage Site, Akron, Ohio
(Confidential) ~COR-077241-01~

David Star to: Kenneth Zolnierczyk
Cc: Julie Morris, Kendall Moore

01/14/2013 04:49 PM

Ken:

We (you, Julie, Kendall and I) should discuss as soon as possible before I respond back to Peter (with a "Cc" to everyone else on his email). Please set up a short 30 minutes meeting for this week. (Good luck finding an opening on my calendar.)

Thanks.

David Star
Chief, Pesticides & Toxics Compliance Section
Chemicals Management Branch
U.S. EPA / Region 5 / Chicago
Telephone: 312-886-6009
Facsimile: 312-692-2536

"There is no economic stability without ecological stability."

----- Forwarded by David Star/R5/USEPA/US on 01/14/2013 04:46 PM -----

From: Peter Ramanauskas/R5/USEPA/US
To: David Star/R5/USEPA/US@EPA,
Cc: Paul Little/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA, Tammy
Moore/R5/USEPA/US@EPA
Date: 01/14/2013 04:01 PM
Subject: *Confidential: Fw: Former City Scrap & Salvage Site, Akron, Ohio (Confidential) ~COR-077241-01~

Dave,

By the notification below, we've been informed of a scrap yard which has generated PCB contaminated soil piles. Samples of the piles collected after generation indicate PCB contamination in a couple of piles in excess of 50 ppm. These piles were generated as the result of a "metals mining" operation (noted below) where the owner screened the site soils to extract and recycle metal material contained therein. By the attached email and letter, they wish to transport the piles which tested < 50 ppm to a Subtitle D facility in Ohio. It seems that these piles were generated sometime in the fall of 2012 and they do not appear to be stored per 761.65(c)(9). I've verbally told CRA that all piles will have to be disposed of as containing > 50 ppm since no in-situ sampling was conducted prior to their generation and, even though the piles were not generated as part of a previously approved remedial action but site "metal mining" activities, this still violated the anti-dilution provision of TSCA since data from the piles shows that > 50 ppm contamination exists at the site.

I wanted to check with you before responding to CRA to see if PTCS would consider disposal of all soil piles as something other than > 50 ppm and/or is interested in pursuing any additional action for violations at the site.

Thanks,
Peter

----- Forwarded by Peter Ramanauskas/R5/USEPA/US on 01/14/2013 03:08 PM -----

From: "Cooke, Henry" <hpcooke@craworld.com>



Fw: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

Peter Ramanauskas to: Kenneth Zolnierczyk

01/22/2013 01:58 PM

----- Forwarded by Peter Ramanauskas/R5/USEPA/US on 01/22/2013 01:58 PM -----

From: "Cooke, Henry" <hpcooke@croworld.com>
To: Peter Ramanauskas/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Katz, Steven M." <katzs@timken.com>, "Katz, Randy S." <katzr@timken.com>,
"akatz1970@neo.rr.com" <akatz1970@neo.rr.com>, Project Email Hold <filing@croworld.com>
Date: 01/17/2013 02:48 PM
Subject: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

Peter;

Attached please find additional information concerning the soil stockpiles at the Former City Scrap & Salvage site in Akron, Ohio. The information in this letter should be considered in conjunction with our letter dated January 11, 2013.

We look forward to hearing from you.

Henry Cooke
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9033 Meridian Way
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45069
(513) 942-4750 (p)
(513) 942-8585 (f)
(513) 200-8905 (c)



077241RAMA-02 (2)-Final.pdf

Fw: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Ramanauskas, Peter

Tue 1/22/2013 1:58 PM

Mark as unread

To: Zolnierczyk, Kenneth;

📎 1 attachment

077241RAMA-02 (2)-Fi...
993 KB

----- Forwarded by Peter Ramanauskas/R5/USEPA/US on 01/22/2013 01:58 PM -----

From: "Cooke, Henry" <hpcooke@craworld.com>

To: Peter Ramanauskas/R5/USEPA/US@EPA, Kenneth Bardo/R5/USEPA/US@EPA,

Cc: "Katz, Steven M." <katzs@timken.com>, "Katz, Randy S." <katzr@timken.com>, "akatz1970@neo.rr.com" <akatz1970@neo.rr.com>, Project Email Hold <filing@craworld.com>

Date: 01/17/2013 02:48 PM

Subject: Former City Scrap & Salvage Site Soil Disposal ~COR-077241-01~

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PCB composite sampling guidance ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Mon 3/11/2013 6:10 AM

To: Zolnierczyk, Kenneth;

Cc: ☐ Project Email Hold <filing@craworld.com>;

📎 1 attachment

Akron-20121112-0028...
318 KB

Hello Ken. I just wanted to confirm that you still wanted us to follow the guidance document you sent us, since the material we are dealing with is not fluff (see attached picture). The material is mostly soil with some rocks, small concrete, wood fragments, etc. The shredding activities at the former City Scrap site were conducted a separate location (former lower yard).

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From: Zolnierczyk, Kenneth [mailto:zolnierczyk.kenneth@epa.gov]
Sent: Wednesday, March 06, 2013 11:45 AM
To: Cooke, Henry
Subject: composite sampling guidance

Henry,

Attached is the guidance document we talked about. Let me know if you have any questions or suggestions concerning the methodology. I should be available the rest of the day, so if I'm not at my desk leave me a message.

Ken Zolnierczyk
Environmental Engineer
Chemicals Management Branch

Soil Pile Sampling, Former City Scrap & Salvage Site, Akron, Ohio ~COR-077241-01~

✕ DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Fri 3/15/2013 12:55 PM

To: Zolnierczyk, Kenneth; Ramanauskas, Peter;

Cc: ☐ Katz, Steven M. <katzs@timken.com>; ☐ Katz, Randy S. <katzr@timken.com>; ☐ akatz1970@neo.rr.com;
☐ Project Email Hold <filing@craworld.com>;

📎 1 attachment

201303151448.pdf
792 KB

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Good afternoon Ken. As you requested I am forwarding some additional information about the soil piles at the Former City Scrap & Salvage site in Akron, Ohio. Please review the data and provide me with any comments you may have.

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Soil Pile Sampling, Former City Scrap & Salvage Site, Akron, Ohio ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Wed 3/20/2013 12:57 PM

To: Zolnierczyk, Kenneth;

Cc: ☐ Project Email Hold <filing@craworld.com>;

Hello Ken. I thought I would send you a short email to see if you had time to review the letter I sent you last week and if so, whether you were comfortable with our proposed confirmation sampling procedure of the clean soils (i.e. soil which has < 50 ppm total PCBs)?

Henry

From: Cooke, Henry

Sent: Friday, March 15, 2013 2:54 PM

To: 'Zolnierczyk, Kenneth'; 'Ramanauskas.peter@epa.gov'

Cc: 'Katz, Steven M.'; Katz, Randy S.; akatz1970@neo.rr.com; Project Email Hold

Subject: Soil Pile Sampling, Former City Scrap & Salvage Site, Akron, Ohio ~COR-077241-01~

Good afternoon Ken. As you requested I am forwarding some additional information about the soil piles at the Former City Scrap & Salvage site in Akron, Ohio. Please review the data and provide me with any comments you may have.

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(513) 200-8905 (c)

RE: Soil Pile Sampling, Former City Scrap & Salvage Site, Akron, Ohio ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Tue 3/26/2013 7:16 AM

To: Zolnierczyk, Kenneth;

Cc: ☐ Project Email Hold <filing@craworld.com>;

Hello Ken. Have you had a chance to review the letter I sent you on March 15th? I noticed that in the letter I referred to the Waste Management American landfill as a Subtitled C landfill. It is actually a Subtitled D municipal landfill that is licensed to accept non TSCA, non RCRA hazardous waste material.

Henry

From: Cooke, Henry

Sent: Friday, March 15, 2013 2:54 PM

To: 'Zolnierczyk, Kenneth'; 'Ramanauskas.peter@epa.gov'

Cc: 'Katz, Steven M.'; Katz, Randy S.; akatz1970@neo.rr.com; Project Email Hold

Subject: Soil Pile Sampling, Former City Scrap & Salvage Site, Akron, Ohio ~COR-077241-01~

Good afternoon Ken. As you requested I am forwarding some additional information about the soil piles at the Former City Scrap & Salvage site in Akron, Ohio. Please review the data and provide me with any comments you may have.

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Former City Scrap & Salvage Site Soil Pile Disposal ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Fri 4/5/2013 10:49 AM

To: Zolnierczyk, Kenneth;

Cc: ☐ Project Email Hold <filing@craworld.com>; ☐ Katz, Steven M. <katzs@timken.com>;
☐ Katz, Randy S. <katzr@timken.com>; ☐ akatz1970@neo.rr.com;

@ 1 attachment

77241-01(ZOLN002)fig...
506 KB

Ken: As a follow-up to our call on April 1, 2013, I am forwarding the attached figures for your review and approval. The figures present the procedure for removing hot spots from the soil piles and the retesting of the remaining soil to confirm that the material is non TSCA before it is shipped to the American Landfill (Subtitled D municipal landfill) for disposal. Figure 4 shows six new reshaped soil piles after the hot spots indicated on Figure 1 and 2, have been removed. The number and the length of each soil pile will be determined in the field based on space limitations. Each pile will be divided up into units for sampling purposes, containing nine, 5'x5' grids. Each grid represents a different sample depth as indicated in the figure notes. One grid from each unit will be randomly selected for sampling. If the sample from the unit records a total PCB concentration of 50 ppm or higher, the material in the unit will be considered TSCA material. If the sample total PCB concentration is less than 50 ppm, the material in the unit will be considered non TSCA and will be eligible for disposal at the American Landfill.

I will call you in the afternoon of April 8, 2013 to discuss any comments you may have.

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RE: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Tue 4/16/2013 6:18 AM

To: Zolnierczyk, Kenneth;

Cc: ☐ Project Email Hold <filing@craworld.com>;

Hello Ken. Would it be possible for you to send me an email saying you received my April 12th email & letter and it is okay for us to proceed with the soil disposal and resampling as outlined in the letter? The client is hesitant to proceed without an acknowledgement from the USEPA. Thank you.

Henry

From: Cooke, Henry

Sent: Friday, April 12, 2013 1:25 PM

To: 'zolnierczyk.kenneth@epa.gov'

Cc: Project Email Hold; Katz, Steven M.; katzr@timken.com; akatz1970@neo.rr.com

Subject: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

As discussed by telephone today, I am forwarding the agreed upon protocol to complete the re-sampling of the non TSCA material and disposal of material stockpiled at the Former City Scrap & Salvage Upper Yard area (Site). Please confirm your acceptance of this procedure. My client would like to start the Site re-sampling and the soil disposal as soon as possible.

Henry Cooke

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FW: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

X DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Wed 4/17/2013 11:19 AM

To: Zolnierczyk, Kenneth;

You replied on 4/17/2013 11:30 AM.

@ 1 attachment

201304121322.pdf
1 MB

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From: Cooke, Henry

Sent: Friday, April 12, 2013 1:25 PM

To: 'zolnierczyk.kenneth@epa.gov'

Cc: Project Email Hold; Katz, Steven M.; katzr@timken.com; akatz1970@neo.rr.com

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RE: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

✕ DELETE ← REPLY ⇐ REPLY ALL → FORWARD ...



Zolnierczyk, Kenneth

Wed 4/17/2013 11:42 AM

Mark as unread

To: ☐ Cooke, Henry <hpcooke@craworld.com>;

Mr. Cooke,

The information provided in your letter dated April 12, 2012 regarding disposal of PCB contaminated material from the former City Scrap Site has been reviewed. I consulted with our statistician on the proposed methodology for sampling the waste piles at this site. He is in agreement that this methodology is fine to use for characterization of the waste piles for disposal. If you have any additional question please contact me at (312) 353 – 9697.

Ken Zolnierczyk
Environmental Engineer
Chemicals Management Branch

From: Cooke, Henry [mailto:hpcooke@craworld.com]

Sent: Wednesday, April 17, 2013 12:19 PM

To: Zolnierczyk, Kenneth

Subject: FW: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

From: Cooke, Henry

Sent: Friday, April 12, 2013 1:25 PM

To: 'zolnierczyk.kenneth@epa.gov'

Cc: Project Email Hold; Katz, Steven M.; katzr@timken.com; akatz1970@neo.rr.com

Subject: Soil Disposal at the Former City Scrap & Salvage Site in Akron, Ohio ~COR-077241-01~

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Soil Sample Analytical Results: Former City Scrap & Salvage Site ~COR-077241-01~

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↶ REPLY ALL

→ FORWARD

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Cooke, Henry <hpcooke@craworld.com>

Mark as unread

Thu 6/13/2013 1:02 PM

To: ☐ Nesbit, Karen <Karen.Nesbit@epa.state.oh.us>;

Cc: ☐ Zolnierczyk, Kenneth; ☐ Project Email Filing <filing@craworld.com>;

1 attachment

◀ ▶

201306131449.pdf
1 MB

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Attached please find a summary of the confirmation sampling that we have completed on the soil piles located at the Former City Scrap & Salvage site in Akron, Ohio. A hard copy of the letter will be sent by mail to both of you.

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